UNITED STATES MARINE CORPS
Marine Corps Systems Command
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CSI/425
28 Nov 01

COMMAND POLICY LETTER NO. 10-01

From: Commander

Subj: INFORMATION TECHNOLOGY (IT) WAIVER PROCESS

Ref: (a) MARADMIN 473/01
      (b) OASN (RDA) Memorandum of 19 Oct 2000
      (c) CMC Washington DC MSG 040900Z Jan 01
      (d) E-mail dtd 19 Dec 00 between MGen Lee/Mr Stolark re:
          Delegation of Waiver Approval Authority

Encl: (1) Waiver Submission Instructions
      (2) Determination for Approval to Award IT Related
          Procurement Template

1. <u>Purpose</u>. To provide MARCORSYSCOM policy and guidance
regarding the proper approval process for the procurement of
Information Technology (IT).

2. <u>Goal</u>. With the impending transition to the Navy Marine
Corps Internet (NMCI) it is necessary to avoid the duplication
of spending on IT related products and services (management) and
obtain visibility on IT spending (oversight). The IT waiver
process is designed to validate all requests for the procurement
of IT goods and services.

3. <u>Background</u>. On October 6, 2000, the Navy awarded a
contract to EDS for the Navy Marine Corps Intranet (NMCI). This
contract provides for furnishing of IT resources for the
Department of Navy to include hardware, software, and
infrastructure. Currently, the Marine Corps is scheduled to
transition to NMCI in 3rd Quarter FY 2002. In order to ensure a
smooth transition to NMCI and to avoid duplication of costs for
IT-related expenditures, the Navy issued guidance to contracting
activities to initiate steps to monitor and control the award,
modification and use of other IT contracts. On 19 October 2000,
OASN (RDA) signed into policy the reference (b) memorandum which
required Head of Contracting Activity (HCA) review and approval
of all prospective IT procurements in excess of $25,000 in order
to ensure that they were only for IT capabilities which would be

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either (i) unavailable under the NMCI contract, (ii) clearly needed before delivery under the NMCI contract, or (iii) for IT services for which the period of performance would expire prior to transition to NMCI. Shortly thereafter, Headquarters Marine Corps C4 established a process for the review of all USMC IT-related requirements. This review was implemented by reference (c) which directed, as of 4 Jan 01, all Marine Corps commands to cease purchase of all IT related equipment to include hardware, network infrastructure-type equipment (routers, switches, wiring) and all peripheral equipment (printers, scanners, ancillary type equipment). The purpose of this policy was to minimize IT-related expenditures while the Marine Corps developed plans and policy for the transition to NMCI. As a result of reference (c), Headquarters C4 established a Waiver Board to review Marine Corps IT requirements to ensure compliance with this policy. Reference (d) delegated waiver approval authority from Commander, MATCOM to the Deputy Commander, MARCORSYSCOM.

4. <u>Action.</u> Contracting Officer is responsible for the implementation of this policy.

    a. Deputy Commander shall:

        (1) Review all waiver requests over $25,000 for compliance with reference (a).

        (2) Approve or disapprove waivers forwarded from HQ C4.

    b. Director of Contracts shall:

        (1) Ensure an approved waiver accompanies all requests for IT procurements.

    c. Deputy CIO shall:

        (1) Review C4 waiver requests for technical accuracy, completeness, in accordance with policy and guidance.

        (2) Approve or disapprove all waiver requests with a value of $25,000 or less.

        (3) Represent MARCORSYSCOM at the C4 Waiver Board and monitor the status of MARCORSYSCOM's waiver requests.

        (4) Forward waiver requests over $25,000 to HQMC C4
Waiver Board for approval. Upon receipt of HQMC C4 approval,
forward waiver requests over $25,000 to Deputy Commander for
approval.

        (5) Notify Project Officers of the disposition of
waiver requests.

        (6) Record all requests whether approved or
disapproved and submitted to HQMC C4-CIO for tracking purposes.

        (7) For all Marine Common Hardware Suite (MCHS)
related procurements, coordinate with the PM Navy Marine Corps
Intranet (NMCI)/Information Infrastructure (IT) POC to validate
requirements and ensure adequacy of funding prior to wavier
approval.

    d. Project Officers shall:

        (1) Prepare a Determination and Findings (D&F) for all
IT related procurements over $25,000 in accordance with
enclosure (1). For procurements under $25,000 a short
justification sent via email may be used in lieu of the D&F.

        (2) Forward all waiver requests to the Deputy CIO for
processing.

        (3) Respond to any questions surrounding the request
for waiver. This includes possible briefings to HQ C4 as
requested.

5. Applicability. This policy applies to all MARCORSYSCOM
personnel to include military, civilian, contractors, and other
affiliates who work within MARCORSYSCOM.

                            L. P. KREITZER
                            Deputy Commander

Distribution: A

INSTRUCTIONS FOR USE AND SUBMISSION OF THE
DETERMINATION AND FINDING FOR APPROVAL TO AWARD
IT RELATED PROCUREMENT

The following provides guidance and the standard format for submitting a request for approval of all prospective Information Technology (IT) procurements in accordance with DON ASN RDA memorandum of 19 October 2000 and covers acquisitions within MARCORSYSCOM and its subordinate activities.

1. This guidance is applicable to all IT acquisition in excess of $25,000 (including Delivery Orders against existing contracts and modifications to existing contracts) unless the acquisition meets the criteria for exemption as provided in the DON ASN RDA memorandum of 19 October 2000 at subparagraph (a).

2. Approval shall be obtained as soon as practical but *prior to award* for all acquisitions in which the solicitation was released on or before **01 December 2000.**

3. Approval shall be obtained *prior to the release of the solicitation* for all acquisitions in which the solicitation will be released **on or after 01 January 2001.**

4. Attached is a standard template format for use in preparing the approval request. Instructions for each section are contained in the template.

5. All requests shall indicate how the acquisition is essential to the successful execution of a command or program initiative and is clearly needed before it can be delivered under the NMCI contract.

6. Requests shall be electronically submitted and attached to an email. Emails shall be directed to Susan Doss at mailto:dossst@mcsc.usmc.mil with the subject Line of "IT Waiver Request for *[insert the program or project name].* Requests will be reviewed and forwarded to Headquarters Marine Corps.

7. Once a final decision has been made the approval or dis-approval shall be sent via return email. The Deputy Commander will have the final approval authority for the Command.

Enclosure (1)

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DETERMINATION AND FINDING FOR APPROVAL TO AWARD
IT RELATED PROCUREMENT

In accordance with DON ASN RDA memorandum of 19 October 2000, approval is requested for the *[insert program or project requirement]*. This is for the purchase of *{insert exactly what is being procured, i.e. hardware, software, and maintenance}*. *{Identify if this is or is not and NMCI-like function.}*

Point of Contact: *[Insert the name, office code, phone number, fax number and email address of the cognizant point of contact.]*

Background: *[Provide a short paragraph citing the background for the requirement and the need to continue the procurement action.]*

Scope: *[Identify the scope of the requirement. Cite what is to be acquired and the length of the acquisition effort.]*

Funding: *(Insert funding amount by fiscal year and type of money.)*

Alternatives: *[Identify alternatives to accomplish the mission in a concise manner including the major pros and cons of each.]*

HQMC Sponsorship: *{Identify any HQMC sponsorship of the overall program effort.}*

Approval Rationale: *[Identify the approval rationale from the Buchanan Memo to which the requirement applies.]* The rationale is either:
- Prospective purchases/contracts are for IT capabilities that are unavailable under the NMCI contract, or
- Specified hardware, software or IT services are essential to successful execution of a command or program initiative and it is clearly needed before it can be delivered under the NMCI contract, or
- Proposed contract actions are for IT services for which the period of performance will expire before the requiring activity transitions to NMCI (or within a reasonable time thereafter, as agreed to by the NMCI government management office and the requesting official.).

Impact if Not Approved: *{Identify the impact, both short and long term, if the waiver is denied}*

Enclosure (2)

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